Remarks:

The Examiner stated that the title is not descriptive. The title is amended herein to more clearly describe the invention.

Claims 1-57 were submitted for Examination. The Examiner rejected claims 1-57 under 35 U.S.C. § 102(e) as being unpatentable over United States Patent 6,018,721 to Aziz et al. ("Aziz"). Applicants respectfully traverse this rejection.

Applicants respectfully note that the Examiner did not clearly explain the pertinence of Aziz to the rejection of the pending claims, as required by 37 C.F.R. § 1.104(c)(2). Instead, the Examiner quoted each pending claim, and cited sections of Aziz that the Examiner presumably believes teach the claims. In many instances, the citations are applied not to individual claim limitations, or even to individual claims, but instead to groups of claims. No explanation is given as to why these citations are pertinent to the rejection of the pending claims.

For example, in rejecting claims 10-18 and 32-57, the Examiner merely states "see figs. 1-8, col. 2, line 15-col. 3, line 25; col. 4, line 40-col. 12, line 13." These citations comprise all of the figures but one, the entire Summary of Invention section of the patent, and the overwhelming majority of the Detailed Description section. Without explanation, it is not apparent how such citations are pertinent to the rejection. Thus, the ground for rejection is not "fully and clearly stated," as required by MPEP 707.07(d).

Applicants respectfully submit that Aziz neither teaches nor suggests the pending claims. For example, claim 1 recites "accessing a stored plurality of exchange rates for the first currency with respect to the second currency, each exchange rate corresponding to a

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time period." Aziz mentions "exchange rate" solely in the context of converting foreign currency into a base currency in order to determine if sufficient collateral exists to secure a transaction. Nothing in Aziz suggests a plurality of exchange rates, each corresponding to a time period. This claimed plurality of time periods enables the utilization of a correct exchange rate for a specific time period, thereby allowing accurate calculations involving exchanges of currency at specific points in time. By using this plurality of time periods, Applicants' invention avoids the inaccuracies inherent in systems that use a specific exchange rate for a particular currency.
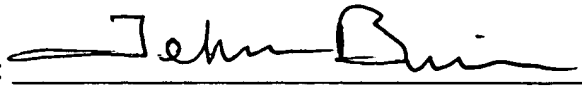
By contrast, Aziz discloses a system that addresses an entirely different problem. Aziz concerns validating collateral in an account, calculating the optimal "security haircut" for the current set of circumstances (a security haircut is a percentage by which to discount the full value of a security, calculated by taking into account various risk factors), and rejecting or accepting a specific secured transaction based on the existing collateral and calculated security haircut. *See, e.g.*, Aziz col. 2, lines 14-49. Aziz supports validating collateral in the form of foreign currency, and thus does disclose converting foreign currency into U.S. dollars according to an exchange rate. *See, e.g.*, Aziz col. 2, lines 31-34. However, nothing in Aziz discloses or suggests a plurality of exchange rates at all, much less "accessing a stored plurality of exchange rates for the first currency with respect to the second currency, each exchange rate corresponding to a time period," as recited by, for example, claim 1.

As Aziz does not teach or disclose the claimed subject matter, Applicants respectfully submit that claims 1-57 are patentably distinct over Aziz. On the basis of the

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above remarks, reconsideration of this application and the early allowance of all claims herein are respectfully requested.

Respectfully submitted,
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Dated: _8/ 9/ 0 2_

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